

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS

Plaintiff,

-vs-

THE MIDDLE EAST FORUM,  
DANIEL PIPES (*individually*),  
GREGG ROMAN (*individually*), and  
MATTHEW BENNETT (*individually*)

Defendants.

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CIVIL ACTION NO. 2:19-cv-05030-JDW

**DEFENDANTS' PARTIAL MOTION TO DISMISS**  
**PURSUANT TO FED. R. CIV. P. 12(b)(6)**

Defendants The Middle East Forum, Daniel Pipes, Gregg Roman, and Matthew Bennett by their attorneys, Cozen O'Connor, hereby move to dismiss Claims I-V and X-XIII of Plaintiff's Complaint pursuant to Fed. R. Civ. P. 12(b)(6), and in support thereof offer the accompanying Memorandum of Law.

/s/ David J. Walton

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Leigh Ann Benson, Esquire  
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*Attorneys for Defendants*  
*The Middle East Forum, Gregg Roman, Daniel*  
*Pipes, and Matthew Bennett*

Dated: November 27, 2019

CERTIFICATE OF SERVICE

I hereby certify that I served upon all person listed below a true and correct copy of the within  
Partial Motion to Dismiss upon Seth Carson, Esquire

/s/ David J. Walton

David J. Walton, Esquire

**COZEN O'CONNOR**

*Attorney for Defendants,  
The Middle East Forum, Daniel Pipes, Gregg  
Roman, and Matthew Bennett*

Dated: November 27, 2019